

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: MOVEIT CUSTOMER DATA  
SECURITY BREACH LITIGATION

MDL No. 1:23-md-03083-ADB-PGL

This Document Relates To:

1:23-cv-12478  
1:23-cv-12281  
1:23-cv-12561  
1:23-cv-13079  
1:24-cv-11523  
1:23-cv-12226  
1:23-cv-12273

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
PROPOSED CLASS ACTION SETTLEMENT**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs<sup>1</sup> hereby move this Court for entry of an Order: (1) granting preliminary approval of the proposed Class Action Settlement Agreement and Release between themselves and Nuance Communications, Inc.; (2) provisionally certifying the proposed Settlement Class; (3) conditionally appointing Plaintiffs as Settlement Class Representatives; (4) conditionally appointing Lead Counsel and Liaison Counsel as Settlement Class Counsel; (5) approving the form and manner of notice; (6) ordering that notice be disseminated to the Settlement Class according to the Settlement's terms; (6) establishing deadlines for Settlement Class Members to request exclusion from the Settlement Class, file objections to the Settlement, or file Claims for a Settlement Payment; and (7) setting the proposed

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<sup>1</sup> Plaintiffs are Denise Peel, Kristen Eyester, Juan Salas, Patricia Callahan, Kayla Farrar, and Justin Okeke ("Plaintiffs").

schedule for completion of further settlement proceedings, including scheduling the final fairness hearing.

This Motion is based upon the record in this case as well as the concurrently filed: (1) Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval; (2) Declaration of Gary F. Lynch in Support of Plaintiffs' Motion for Preliminary Approval and the exhibits attached thereto; and (3) Declaration of Justin Parks Regarding Notice Program, as well as any additional materials and argument that may be presented to the Court.

Dated: July 30, 2025

Respectfully submitted,

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*Lead Counsel for Plaintiffs*

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that, pursuant to Local Rule 7.1(a)(2), that counsel for Plaintiffs have conferred in good faith with counsel for Defendant Nuance Communications, Inc., and Defendant does not oppose this Motion.

Dated: July 30, 2025

/s/ Gary F. Lynch

Gary F. Lynch

**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record.

Dated: July 30, 2025

/s/ Kristen A. Johnson

Kristen A. Johnson (BBO# 667261)